

1 KELLER BENVENUTTI KIM LLP
2 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
3 Peter J. Benvenutti (#60566)
(pbenvenutti@kbkllp.com)
4 Jane Kim (#298192)
(jkim@kbkllp.com)
5 650 California Street, Suite 1900
San Francisco, CA 94108
6 Tel: 415 496 6723
Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*
8

9
10 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11
12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC
COMPANY,**

16 **Debtors.**

17
18 Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

19 * *All papers shall be filed in the Lead Case, No.
20 19-30088 (DM).*

21 Bankruptcy Case No. 19-30088 (DM)

22 Chapter 11

23 (Lead Case) (Jointly Administered)

24 **REORGANIZED DEBTORS' REVISED¹
REPORT ON RESPONSES TO EIGHTH
OMNIBUS OBJECTION TO CLAIMS (NO
LIABILITY CLAIMS) AND REQUEST FOR
ORDER BY DEFAULT AS TO UNOPPOSED
OBJECTIONS**

25 **[Re: Dkt. No. 8983]**

26 **Resolving Objections Set for Hearing
October 13, 2020 at 10:00 a.m. (Pacific Time)**

27
28 ¹ The Reorganized Debtors' Report on Response to Eighth Omnibus Objection to Claims (No Liability
Claims) and Request for Order by Default as to Unopposed Objections [Docket No. 9257] erroneously
omitted Exhibit 1. This Revised Report is identical in all other respects.

REQUEST FOR ENTRY OF ORDER BY DEFAULT

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to
4 the Plan (as defined below), the “**Reorganized Debtors**” in the above-captioned chapter 11 cases (the
5 “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for
6 the United States District Court for the Northern District of California, as made applicable to these
7 Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management*
8 *Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court
9 enter an order by default on the *Reorganized Debtors’ Eighth Omnibus Objection to Claims (No*
10 *Liability Claims*) [Docket No. 8983] (the “**Eighth Omnibus Objection**”).

RELIEF REQUESTED IN THE EIGHTH OMNIBUS OBJECTION

The Eighth Omnibus Objection seeks to disallow and expunge the Proof(s) of Claim listed in the column headed “Claims to be Disallowed and Expunged” in Exhibit 1 to the Eighth Omnibus Objection.

NOTICE AND SERVICE

A *Notice of Hearing on Reorganized Debtors' Eighth Omnibus Objection to Claims (No Liability Claims)* was filed concurrently with the Eighth Omnibus Objection on September 3, 2020 [Docket No. 8985] (the “**Notice of Hearing**”). The Eighth Omnibus Objection, the supporting declaration of Robb McWilliams [Docket No. 8984], and the Notice of Hearing were served as described in the *Certificate of Service of Andrew G. Vignali*, filed on September 15, 2020 [Docket No. 9044] (the “**Certificate of Service**”). As further described in the Certificate of Service, on September 4, 2020, each Proof of Claim listed on Exhibit 1 to the Eighth Omnibus Objection received the *Notice of the Reorganized Debtors' Eighth Omnibus Objection to Claims (No Liability Claims)*, customized to include the claim number, debtor, claim amount and priority, and the basis for objection of the disallowed claim, and claim number and claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Eighth Omnibus Objection has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
1 2 3 4 5 6	Informal Mendocino County Inland Water Agency and Power Commission (MCIWAPC)	86469	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 15, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
7 8 9 10 11 12 13 14 15 16 17	Informal California Department of Water Resources	66196	The Eighth Omnibus Objection is SUSTAINED with respect to this Claim; provided however, pursuant to Paragraph 67(k) of the Confirmation Order, notwithstanding anything in the Plan, the Confirmation Order, or this Order to the contrary, DWR shall be entitled to pursue any Claim against or otherwise exercise any rights against the Debtors and Reorganized Debtors in respect of the proceeds of the DWR Bond Charge as if the Chapter 11 Cases had not been commenced; and further provided that any such action shall be subject to the terms of the CPUC- DWR Rate Agreement, applicable CPUC decisions and orders, the California Water Code, and any other applicable law.
18 19	Informal California Department of Fish and Wildlife	72176	The Eighth Omnibus Objection is WITHDRAWN with respect to this Claim.
20 21	Informal Central Valley Regional Water Quality Control Board	72173	The Eighth Omnibus Objection is WITHDRAWN with respect to this Claim.
22 23 24 25 26	9134 ArborMetrics Solutions, LLC	97050	Claimant contends that its Claim is a Fire Victim Claim as defined in the Plan. Accordingly, Claim No. 97050 will be disallowed because it is not an obligation of the Debtors' estate. Instead, the Claim will be channeled to the Fire Victims Trust to be addressed there as a Fire Victim Claim, all rights reserved.
27 28	9135 Trees, LLC	97048	Claimant contends that its Claim is a Fire Victim Claim as defined in the Plan. Accordingly, Claim No. 97050 will be disallowed because it is not an obligation of the Debtors' estate.

Docket No.	Claimant	Claim No.	Resolution
			Instead, the Claim will be channeled to the Fire Victims Trust to be addressed there as a Fire Victim Claim, all rights reserved.
Informal	Irene George	5239	Claimant directed the Reorganized Debtors to re-serve the Eighth Omnibus Objection on her next of kin. The Reorganized Debtors have done so, and will grant Claimant's sons an extension the response deadline to October 13, 2020, and the hearing will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response has been filed with respect to the Eighth Omnibus Objection except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and expunging the Proofs of Claims listed in the column headed “Claims to be Disallowed and Expunged” in Exhibit 1 to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Eighth Omnibus Objection, except as otherwise discussed above.

Dated: October 8, 2020

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors